

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**WSOU INVESTMENTS, LLC d/b/a
BRAZOS LICENSING AND
DEVELOPMENT,**

Plaintiff,

v.

ZTE CORPORATION,

Defendant.

Civil Action No.: 6:20-cv-00497-ADA

JURY TRIAL DEMANDED

**JOINT MOTION TO STAY BRIEFING DEADLINES FOR SUMMARY JUDGMENT
OF INVALIDITY FOR LACK OF SUBJECT MATTER ELIGIBILITY (DKT. 253)**

TO THE HONORABLE COURT:

Defendant ZTE Corporation (“Defendant”) and Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“Plaintiff”) (collectively, “Parties”) submit this Joint Motion to stay briefing deadlines for the Summary Judgment of Invalidity for Lack of Subject Matter Eligibility under 35 U.S.C. § 101 (Dkts. 253, 256, 273), until the Court resolves the forthcoming dispute pertaining to Defendant’s request of a limited half-day deposition of Plaintiff’s expert, Dr. Michael Brogioli, with respect to his expert declaration submitted for Plaintiff’s Opposition to Defendant’s Motion for Summary Judgment for Ineligibility under 35 U.S.C. § 101 in C.A. No. 6:20-cv-00497-ADA (Dkt. 273); and the stay is to be consistent with the dispositive motions briefing schedule set forth in the Scheduling Order.

The above briefing stay does not change the date of any hearing, trial, or other Court date,

or extend any deadline of a final submission that affects the Court's ability to hold a scheduled hearing, trial, or Court event.

Dated: December 21, 2022

RESPECTFULLY SUBMITTED,

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**Attorney for Defendant
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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing instrument was served or delivered electronically to all counsel of record, on this 23rd day of December 2022, via the Court's CM/ECF system.

/s/ Lionel M. Lavenue
Lionel M. Lavenue